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October 18, 2022

Via ECF and Electronic Mail

Honorable Analisa Torres, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: *Pierce v. Better Holdco, Inc., et al.*
Case No: 22 CV 04748 (AT)

Dear Judge Torres:

We represent the Plaintiff, Sarah J. Pierce (“Pierce”), in the above-referenced matter. We write today pursuant to Section I.A and I.C of the Court’s Individual Practices with regard to the Court’s July 28, 2022 Scheduling Order (Dkt #27). We write today with the consent and agreement of Defendants.

Specifically, we write to request a slight modification of the briefing schedule set forth therein. We jointly request that:

- a. Plaintiff’s time to file her consolidated opposition to the Motions to Dismiss be extended one week from October 25, 2022 to November 1, 2022; and
- b. Defendants’ time to file their replies be extended from November 18, 2022 to December 1, 2022 to accommodate Plaintiff’s request and to allow for time due to the intervening Thanksgiving holiday.

This joint request is the second request for such an extension (the first joint request was granted by the Court). The basis for the request is twofold:

First, and personally by far the most important, I have been (and expect to be for the next week) significantly unavailable as my 92 year-old mother had to be admitted to the hospital over this past weekend. She is currently in the ICU. This has kept me from working on this matter among others;

Second, given the time to move to amend as set forth in the scheduling order, we will likely be cross-moving to amend the complaint, *inter alia*, to add a cause of action for post-employment retaliation.

We thank the Court for its time, attention, and courtesies in this regard.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ethan Leonard', written in a cursive style.

Ethan Leonard

cc: Roberta A. Kaplan
Timothy S. Martin
Kate L. Doniger
Steven W. Perlstein
Steven G. Kobre
Michael Bahn